

MICHAEL FAILLACE & ASSOCIATES, P.C.  
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*Attorneys for Plaintiff*

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK**

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JUAN JOSE SANTILLAN, *individually and  
on behalf of others similarly situated,*

*Plaintiff,*

-against-

**Notice of Motion**

**10 CV 3128 (FB) (MDG)**

CUSTOM STAINLESS STEEL CORP. (d/b/a  
CENTER'S RESTAURANT EQUIPMENT),  
and WALTER HENAO,

*Defendants.*

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SIRS:

PLEASE TAKE NOTICE that, upon the annexed affirmation of Michael A. Faillace, and the affidavit of Plaintiff Juan Jose Santillan, sworn to or affirmed January 20, 2011, and upon the complaint herein, Plaintiff will move this Court, Judge Frederic Block, U.S.D.J., in Courtroom 10 C S, United States Courthouse, 225 Cadman Plaza East, Brooklyn, New York 11201, on the \_\_\_\_ day of January, 2011 at 9:00 a.m., or as soon thereafter as counsel can be heard, for an order pursuant to Rule 55(b) (2) of the Federal Rules of Civil Procedure granting judgment by default against Defendants.

Dated: New York, New York  
January 21, 2011

MICHAEL FAILLACE & ASSOCIATES, P.C.

By: /S/ Michael Faillace  
Michael Faillace [MF-8436]  
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TO:

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